

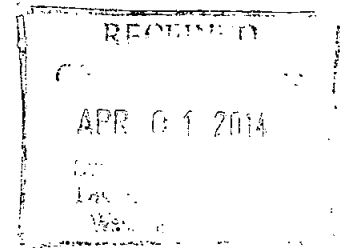
Exhibit BB

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

CIVIL DIVISION-CIVIL ACTIONS BRANCH

Lawrence M. Elliott
Celestine V. Elliott, et al
620 Nicholson Street NW
Washington, DC 20011-2020

____Plaintiffs____



14 - 0001980

Civil Action No. _____

General Motors LLC

____Defendant____

Serve:

Corporation Service Company
1090 Vermont Avenue, NW
Washington, DC 20005

Lawrence M. Elliott and Celestine V. Elliott, husband and wife for many years and family hereafter called WE, come before this Honorable Court for justice in a matter dealing with General Motors Corp. hereafter known as GMC . We are asking for the original cost plus all interest paid for the 2006 Trailblazer SS and the Chevy Cobalt SS about eighty thousand dollars (\$80,000.00) and five hundred thousand dollars (\$500,000.00) for punitive damages both bought new from Curtis Chevrolet located in Washington, DC, now no longer in existence. Five hundred eighty thousand dollars (\$580,000.00).

We are also asking for immediate relief in this matter forthwith in the form of two vehicles provided by GMC at their expense for our transportation until this issue is resolved. WHY? If GMC replaced the fuel pump in our Cobalt SS with the same design that split open, it could happen again with catastrophic results, such as the lose of life and/or serious injury. GMC should be made to declare what was used by this Court ,as soon as possible, so no one will be put in danger. This may well be another recall before someone has to die first or be hurt. We had no idea that we would find both by failure of major systems and other problems that GMC knew of. This problem that could have killed us or still others should be addressed immediately. GMC should be stopped from using old part numbers after fixed issues because it keeps one from knowing if it is the broken one and is safe to use. This was found to be what they did and has been documented. First the Cobalt was known to have problems with the ELECTRIC POWER STEERING that could render the car incapable of being steered or the air bags from deploying. This was fixed under a recall #10V073000.

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While driving the Cobalt we had a strong odor of gasoline that was first thought to be from another vehicle or place. What we found upon close inspection for the source, was a gasoline leak that was from the bottom of the car. It left a puddle on the ground. It was weeks after it started since in the beginning it was not constant. This was very serious. When I researched it I found it had been known for some time by GMC, but was recklessly only stated by GMC after I called them and found it on the WEB.

I found they were only going to fix it if happened in States other than ours. I raised this with GMC and they fixed it by replacing the fuel pump assembly. Recall #09V419000. I saw the part they took from the car and was shocked to find that they had made it of what appeared to be plastic that had developed a split in it. The fuel pump assembly is no place to cut corners. (See attachment 1)

Look at the temperature the Catalytic Converter Muffler operates at and how close it is to the leak. Temperature as high as above 1000 degrees C. (Attachments 2, 3, 4, and 5) IF

THEY REPLACED THE FUEL PUMP ASSEMBLY WITH THE SAME ONE THAT SPLIT. THAT IS CRIMINAL BEHAVIOR AND SHOULD BE YET ANOTHER RECALL. Look at the door lock complaints that did not let one leave the car except through the window (Cobalt). Another complaint.

Even though they say the key lock has been recalled (not until we get the parts) is it a recall.

The key turned the ignition off under many conditions in the Cobalt SS, (the ignition switch was also found to split at times and turn the run cycle to the accessory cycle). The accessory cycle does not have the Air Bags or many features that the Run position supports. They used the same

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part number so how are we to know which is the replacement and which is the old defective one.

This turns the air bags and steering (OFF) both of which are controlled electrically, which is how it kills.

According to what is in the public arena they knew this as early as 2002. It is now 2014. To make matters worse, they did not change the part number so you would not know if you were getting or buying the same defect.

The chrome on the door knobs is bubbling off.

The paint on the arm rest on the door is peeling off almost all looks bad and cheap.

All of the above and possibly more was reckless, fraudulent, wanton, inexcusable and unlawful to say the least. This is why we are bringing the Law Suit. No one (GMC) should ever be permitted to keep one cent under these conditions and should be by any Honorable Court made to pay

punitive damages as well as a determent that will send a message around the world. Further if, this

Honorable Court does justice in this case, we should not be kept silent as a matter of settlement.

This very often is done as a part of Settlements. We have to become more humane.

Our Trailblazer SS (SUV) is unsafe to drive. The Trailblazer SS is showing excessive rust, although we live in an area that has not had that much snow since WE bought it. Many of the critical electrical components that determines how and if the vehicle runs are grounded by a wire from the component ending with a connector to a ground to the body in a rusting environment. (screw, a washer into a thin piece of body sheet metal) When the electrical components of the various systems lose the integrity of ground, they do not operate correctly.

ground, they do not operate correctly). I have a PO121 fault OBD light on that happened just

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after the SUV cut off on my wife while she was driving twice in less than a few blocks. This reads the throttle position that tell the brain (ECM) what the gas peddle position (throttle plate) is.

Wrong message, wrong outcome. This is probably why it cut off and has run so erratic since.

All of the emission components depend on sound connections. The throttle position sensor error

Code PO121 may be a ground issue from rust. GMC carefully stated they were only going

to warrant for rust if it was ALL the way through. If this is legal, then GMC should have said

when the vehicle stars to rust junk it for it will no longer be reliable. This caused her to loose all of her control of the vehicle. We have kept the family and children out of the vehicle since. Our

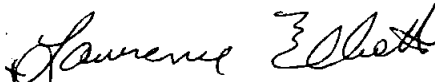
daughter who lives with us has borrowed our neighbor's truck to carry the children, for fear of hurting or possibly killing them. The weather has been too cold for us to check it further.

Considering how deceptive GMC has been, I cannot trust them to touch the vehicle, this is why its use has been very limited. The rust we found is unacceptable.

My wife and I are CDL drivers, which may have been how she was able to survive this mess.

We have been professional drivers for over forty years with many miles of experience.

Respectfully submitted,


Lawrence Elliott


Celestine Elliott



SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

Celestine Elliott
Plaintiff(s)

v.

Case No: _____

General Motors LLC
Defendant(s)

This form supplements COMPLAINT and is being filed along with that
document (list title of pleading, motion, or other document)

(a) If Executed Inside the United States:

I declare (certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on 1st day of April, 2014
(date) (month) (year)

Celestine Elliott
Printed Name

[Signature]
Signature

Washington, DC
City and State, or Other Location

202-744-3558
Phone Number

See D.C. CODE § 22-2402 (a)(3) (2010).

(b) If Executed Outside the United States:

I declare under penalty of perjury under the law of the District of Columbia that the foregoing is true and correct, and that I am physically located outside the geographic boundaries of the United States, Puerto Rico, the United States Virgin Islands, and any territory or insular possession subject to the jurisdiction of the United States. Executed on _____ day of _____,

(date) (month) (year)
at _____,
(city or other locations, and state) (country)

Printed Name

Signature

Phone Number

See D.C. CODE § 16-5306 (2010).

Note: This form may be attached to any document to be used in place of sworn written declarations, verifications, certificates, statements, oaths, or affidavits unless otherwise provided by law; for example, this form may not be used to supplement a verified complaint in the Landlord and Tenant Branch or Small Claims Branch. See D.C. Code §§ 16-1501, 3902 (2001).



SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

1 Lawrence Elliott
Plaintiff(s)

Case No: _____

v.
General Motors LLC
Defendant(s)

This form supplements COMPLAINT and is being filed along with that
document. (list title of pleading, motion, or other document)

(a) If Executed Inside the United States:

I declare (certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on 1st day of April, 2014
(date) (month) (year)

Lawrence Elliott
Printed Name

Lawrence Elliott
Signature

Washington, DC
(City and State, or Other Location)

202-744-5443
Phone Number

See D.C. CODE § 22-2402 (a)(3) (2010).

(b) If Executed Outside the United States:

I declare under penalty of perjury under the law of the District of Columbia that the foregoing is true and correct, and that I am physically located outside the geographic boundaries of the United States, Puerto Rico, the United States Virgin Islands, and any territory or insular possession subject to the jurisdiction of the United States. Executed on _____ day of _____

(date) (month) (year)

at _____
(city or other locations, and state) (country)

Printed Name

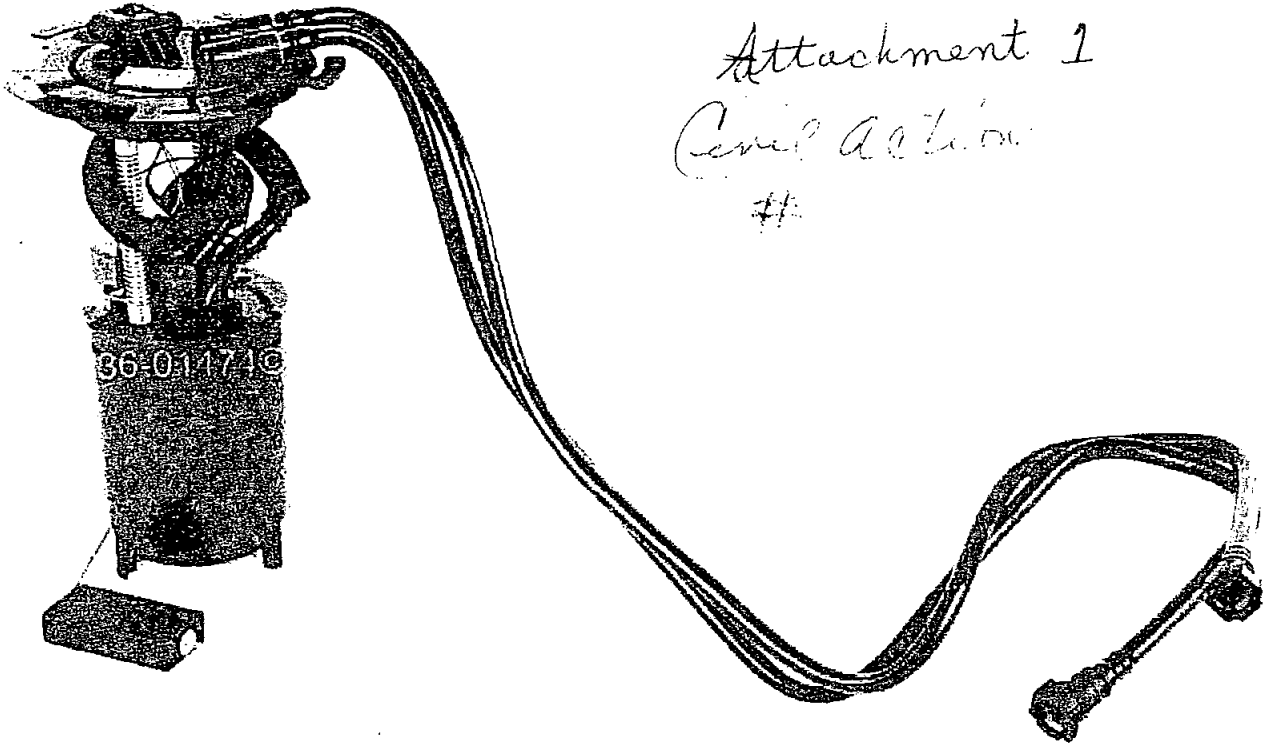
Signature

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See Item Notes



1 of 1

See Item Notes
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Part Number:

eHow » Cars » Driving & Safety » Driving Safety » The Dangers of a Catalytic Converter

The Dangers of a Catalytic Converter

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Since 1975 most cars have included catalytic converters, which remove the most dangerous pollutants from engine exhaust before it is passed to the muffler and out the tailpipe. They do this by passing the exhaust through many clay sheets containing platinum and rhodium. The pollutants bond to these elements and react to form less dangerous molecules which are then emitted. There are several dangers associated with catalytic converters, all of which are avoidable.

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How to Replace a Catalytic Converter



How to Replace a Catalytic Converter

Burns

Catalytic converters get very hot when a car is running, with their exteriors reaching temperatures of 800 to 1,000 degrees F when the engine is working under extremely heavy load conditions. If the car has a partial failure in its ignition system, unburned fuel will reach the converter and push temperatures into the 1,200 to 1,400 F degree range. This presents a clear danger to anyone working underneath the vehicle. To avoid being severely burned, always allow a catalytic converter time to cool before working on it or on anything near it. As a relatively dense structure, it will take longer to cool than other parts of the car.

Fire

The heat produced by a catalytic converter can be enough to ignite dry tinder. In most cases this only happens when a misfiring spark plug or fuel injector results in unburnt fuel reaching the converter. The converter burns the fuel off, raising the temperature high enough to be a fire risk. Never park a car over any dry leaves or brush, as these could be lit on fire by this heat. Be careful not to spray undercoating on the converter, as this could also ignite under high heat conditions and damage the vehicle.

Carbon Monoxide

Catalytic converters remove carbon monoxide, a potentially deadly gas, from car exhaust. If the converter is clogged it may not fully accomplish this. A catalytic converter also must warm up before it starts to work, meaning that even cars equipped with one should never be started in enclosed spaces or household garages. The gas is colorless and odorless, making it a danger to anyone

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eHow • Cars • Auto Repair • Mufflers • How Hot Does a Catalytic Converter Get?

How Hot Does a Catalytic Converter Get?

By Michael Merry eHow Contributor

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The catalytic converter is an important element of a modern vehicle exhaust system. It uses the catalytic action of precious metals to convert combustion pollutants into naturally occurring gases, reducing emissions of hydrocarbons, nitrogen oxides and carbon monoxide to low levels. Have a question? Get an answer from a mechanic now!

Other People Are Reading



How to Tell if a Catalytic Converter Needs to Be Replaced



Is There a Easy Way to Unclog a Catalytic Converter or Does it Have to Be Replaced?

Two Important Design Parameters

The minimum temperature at which a catalytic converter begins to function, called the light-off temperature, is 600-700 degrees F.

Vehicle manufacturers usually minimize the distance between the engine and catalytic converter. This reduces the time required for the converter to reach operating temperature, which in turn reduces cold-start emissions.

Normal Temperatures and Beyond

The ideal operating temperature range of catalytic converters is 900-1,000 degrees F, although they can, and often do, operate above this range.

However, when a converter operates above 1,300 degrees F for prolonged periods, catalysts and converter components begin to melt. The result is a gradual and usually permanent degradation in performance.

High Converter Temperatures Spell Trouble

A converter temperature can rise dramatically when an engine is badly malfunctioning or for some other reason producing an excessive amount of heat and pollutants. In such cases the catalyst temperature can exceed 2,000 degrees F. When this happens the converter becomes deactivated and conversion efficiency approaches zero.

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How to Unplug a Catalytic Converter

Parking

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*Attachment #4**Correction #1*

Always use the parking brake when you park your vehicle. The indicator on the instrument panel shows that the parking brake is not fully released; it does not indicate that the parking brake is firmly set. Make sure the parking brake is set firmly or your vehicle may roll if it is parked on an incline.

If your vehicle has an automatic transmission, set the parking brake before you put the transmission in Park. This keeps the vehicle from moving and putting pressure on the parking mechanism in the transmission — making it easier to move the shift lever out of Park when you want to drive away.

If the vehicle is facing uphill, turn the front wheels away from the curb. If you have a manual transmission, put it in first gear.

If the vehicle is facing downhill, turn the front wheels toward the curb. If you have a manual transmission, put it in reverse gear.

Make sure the parking brake is fully released before driving away. Driving with the parking brake partially set can overheat or damage the rear brakes.

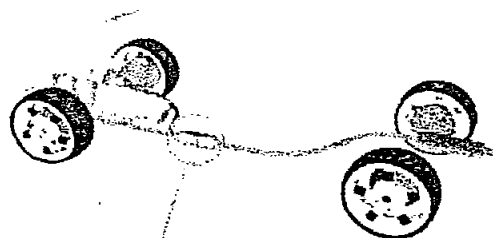
Parking Tips

- Make sure the moonroof and the windows are closed.
- Turn off the lights.
- Place any packages, valuables, etc., in the cargo area or take them with you.
- Lock the doors and the tailgate with the key or the remote transmitter. Make sure the hatch glass is closed securely.
- Never park over dry leaves, tall grass, or other flammable materials. The three way catalytic converter gets very hot, and could cause these materials to catch on fire.

Attachment #5

Civil Action #1

presence of catalyst materials like – Platinum, Rhodium and/or Palladium. In a catalytic converter, large surface area is provided for the chemical reaction to take place and a very small amount of precious catalyst material is distributed throughout the structure in an ultra-thin layer. Catalytic reactions are generally exothermic, so heat-shields and temperature withstanding materials need to be used for its construction. Figure-1 shows the typical placement of a catalytic converter in an automobile.



Catalytic Converter

Fig 1. Location of Catalytic Converter in a typical car.

Generally speaking, catalytic converters are good post-engine emission controlling devices capable of achieving more than 90% reduction of the emissions generated by a well tuned modern engine [1]. However, it should be noted that, this level of performance from a catalytic converter can be only expected, when a number of prerequisites are met. For a catalytic converter to function effectively, it is essential that the proper chemistry and operating temperature be present. These factors are critical to consider when retrofitting a converter on a vehicle which was not originally designed or equipped for its use. These generally include vehicles produced till late 80's in Japan and European countries and till early 80's in USA, many of which are still used in developing countries [2].

Catalytic converters operate under complicated highly dynamic conditions and catalytic reactions occur at typical exhaust gas temperatures leaving the cylinder. This in warmed-up gasoline engines, can vary from 300°C to 400°C during idle, raising even up to about 1000°C, depending on the driving conditions. Different engines possess different warm-up characteristics from cold-start as well. These catalytic reactions depend on the temperature and the composition of the exhaust gas. The activity of the catalyst as a function of its temperature is a critical feature of the catalyst's performance and is affected by a number of exothermic reactions. When the engine is started, the exhaust gas gradually heats up to initiate the catalytic reactions, once the 'light-off' (typically reaching 50% conversion efficiency) temperature is reached. NO_x efficiency remains very high regardless of temperature. However, CO and HC efficiency varies significantly with temperature. As temperature increases CO oxidation reactions typically start first, followed then by HC oxidation [3,4]. Hence the placement of the converter in the exhaust system relative to the engine is important to

ensure that the exhaust temperature is sufficient for the operating range of the catalyst as suggested from figure 2a. On the other hand, if the converter is too close to the engine, it may be exposed to excessive temperature damaging the catalyst [5].

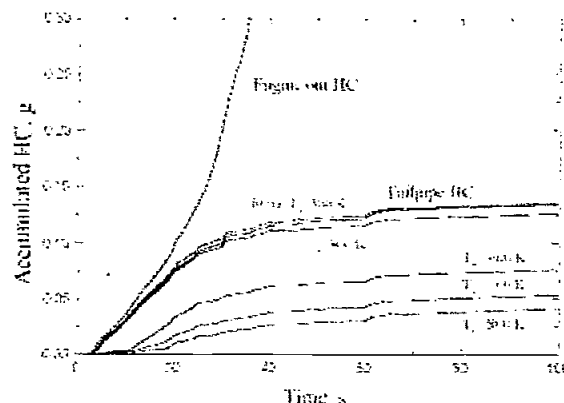


Fig 2a. Effect on HC emission in a FTP cycle as a function of CC start temperature [6].

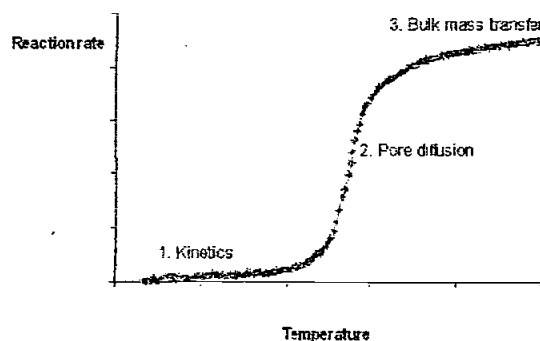


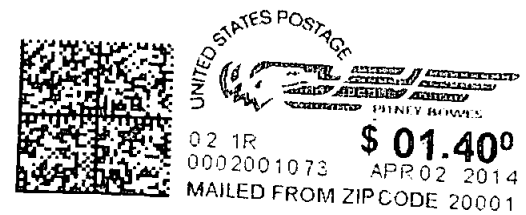
Fig 2b. Typical conversion regimes for controlling CC conversion rate as a function of temperature [7].

Figure 2b presents, a typical activity plot. At low temperatures, the reaction rate is so small that no conversion is reached over the catalyst. In this stage, the reaction kinetics is the controlling factor for the overall reaction rate, whereas in the second stage, the conversion is limited by the pore diffusion in the wash-coat. Catalyst light-off typically occurs in this temperature range. The high temperature region corresponds to bulk mass transfer between the gas phase and wash-coat [7].

Thermocouples (TC) are still the most reliable way of exhaust gas temperature measurement, if exposed to the gas. Unfortunately this is not very convenient to measure the temperature of automotive exhaust passing through the piping. Resistance temperature detectors (RTD) in addition may cause significant disturbances to exhaust flow. To overcome these limitations a number of other techniques are being employed [8]. Infra-Red (IR) sensors are being used to estimate internal exhaust temperature from pipe surface IR measurements [9], systems with high accuracy are expensive. High-temperature stable air borne ultrasonic sensors have been successfully used for exhaust gas

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